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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

OCT. 27 2009

Federal Communications Commission
Office of the Secretary

In re:)
)
Ketchikan TV, LLC) MB Docket No. _____
)
Petition for Rulemaking to Amend) Rulemaking No. _____
the DTV Table of Allotments for)
Station KDMD-DT, Anchorage, Alaska)

To: Office of the Secretary
Attn: Chief, Media Bureau

PETITION FOR RULEMAKING

Ketchikan TV, LLC ("Ketchikan"), licensee of Station KDMD-DT, Anchorage, Alaska, by its counsel hereby requests that the post-transition DTV Table of Allotments ("DTV Table")¹ be amended to change KDMD-DT's digital allotment from Channel 32 to Channel 33 with the technical parameters as indicated in the attached Engineering Statement. This channel substitution serves the public interest by replacing the current STA-based Low Power operation at the studio with a full power station at the originally intended location. The change will assure that an additional 100,000 viewers will be able to receive transmissions from KDMD-DT, and it saves Ketchikan many thousands of dollars in not having to replace an existing combiner and not having to modify an existing transmitter.

The original analog KDMD-TV authorization was for Channel 33 at Eagle River with companion Channel 32 reserved for digital operation. Two other stations were utilizing the same antenna on the tower so a combiner was required. Subsequently, KDMD-DT on Channel 32 was activated on an STA basis from the KDMD studio location in Anchorage due to site limitations at the Eagle River, Alaska site that were subsequently resolved. *See* BDSTA-20030129AMS as extended. *See also* BMPCDT-20080122ABR. At this time, Ketchikan is prepared to activate its full-power DT operations from the

¹ *See* 47 C.F.R. §73.622(i).

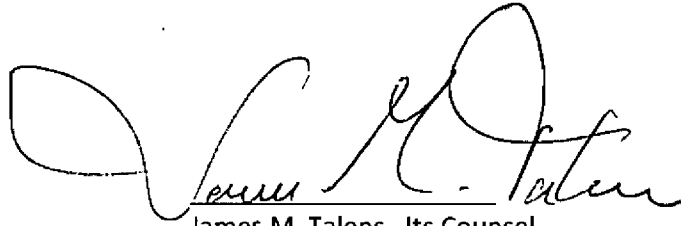
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Eagle River, Alaska site and will be able to do so more efficiently and economically utilizing the existing combiner and related equipment that was originally used in conjunction with analog Channel 33 prior to its transition in favor of Channel 32 under STA at the studio location.

For the foregoing reasons, Ketchikan requests that its KDMD-DT digital allotment be changed from Channel 32 to Channel 33 at the authorized Eagle River location in accordance with the technical specifications set forth in the attached Engineering Statement.

Respectfully submitted,

KETCHIKAN TV, LLC

A handwritten signature in black ink, appearing to read "James M. Talens", written over a horizontal line.

James M. Talens, Its Counsel
6017 Woodley Road
McLean, VA 22101
703.241.1144

Date: October 27, 2009

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*

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B. W. St. Clair

ENGINEERING STATEMENT
Post Transition Digital Channel Change
KDMD-DT, Anchorage, AK, Facility ID 25221

Background

KDMD-DT holds a construction permit on channel 32. It has vacated its analog channel which was channel 33. The channel 32 digital construction permit corresponding to BMPCDT-20080701ABF specifies the same location and antenna pattern as analog KDMD. It is proposed to use channel 33 rather than 32 as the digital assignment in the interest of minimizing the equipment cost associated with the conversion. It is particularly necessary to minimize the conversion cost in a small market such as Anchorage.

Proposed Parameters

It is proposed to use the same antenna and other engineering parameters as specified in the channel 32 construction permit.

Proposed Channel 33 Parameters:

Facility ID	State and City	Chan	ERP (KW)	HAAT (m)	Antenna ID	Latitude DDMMSS	Longitude DDMMSS	Area (sq km)	Population (thous)
25221	AK, Anchorage	33	17.2	300(1)	88082	612010.8	1493048.2	11,890	313774(2)

(1) Antenna height: above ground 50 meters, above mean sea level 627.9

(2) No population loss due to incoming interference

Coverage

A plot of the 40.6 dBμ noise limit contour is included. It differs from the channel 32 contour (40.51 dBμ) by less than the width of the contour plot line.

The 48 dBμ principal city contour is unchanged. The problem of defining the community of Anchorage, AK is well known to the Commission. The parameters of this proposal provide coverage over the Borough of Anchorage populated area. A plot of the 48 dBμ

contour is included as part of this statement. There is no change in the covered area or population in the noise limited contour compared to the channel 32 CP.

Antenna System

The antenna pattern is on file as # 88082. The antenna system is an array of Kathrein panels. Eight panels are oriented at 233° and eight at 13°. The interconnecting harness provides 0.5° electrical beam tilt and 5% null fill.

The channel 32 construction allowed a maximum ratio of 30 dB, in excess of the 15 dB ratio specified §73.685(e). No change in the antenna pattern is proposed and the same waive request will be included in the follow up application for channel 33.

Allocation Study

Outgoing interference to "Post Transition" and "Class A" stations was checked in accordance with OET Bulletin 69 using the Techware supplied interference analysis program. No interference to any station of either class was found.

Power Limitation VS HAAT

The "HAAT is 357 meters and is less than the 365 meters which would require a power reduction below 1000kW under §73.622(f)(8). At 17.2 kW the ERP in this proposal is within the allowed limit.

Preparer's Statement

This statement has been prepared using the information in the KDMD-DT channel 32 construction permit, the antenna manufacturer's data and the Techware interference analysis program. It is true and correct to the best of my knowledge and belief.

Respectfully submitted



Engineering Consultant

October 26, 2009

KDMD-DT, ANCHORAGE, AK, NOISE LIMITED CONTOUR
Proposed Channel 33, 40.60 dBμ

KDMD-DT (CH33)

8MPCDT20080701ABF

Latitude: 61-20-10.80 N

Longitude: 149-30-48.20 W

ERP: 17.20 kW

Channel: 33

Frequency: 587.0 MHz

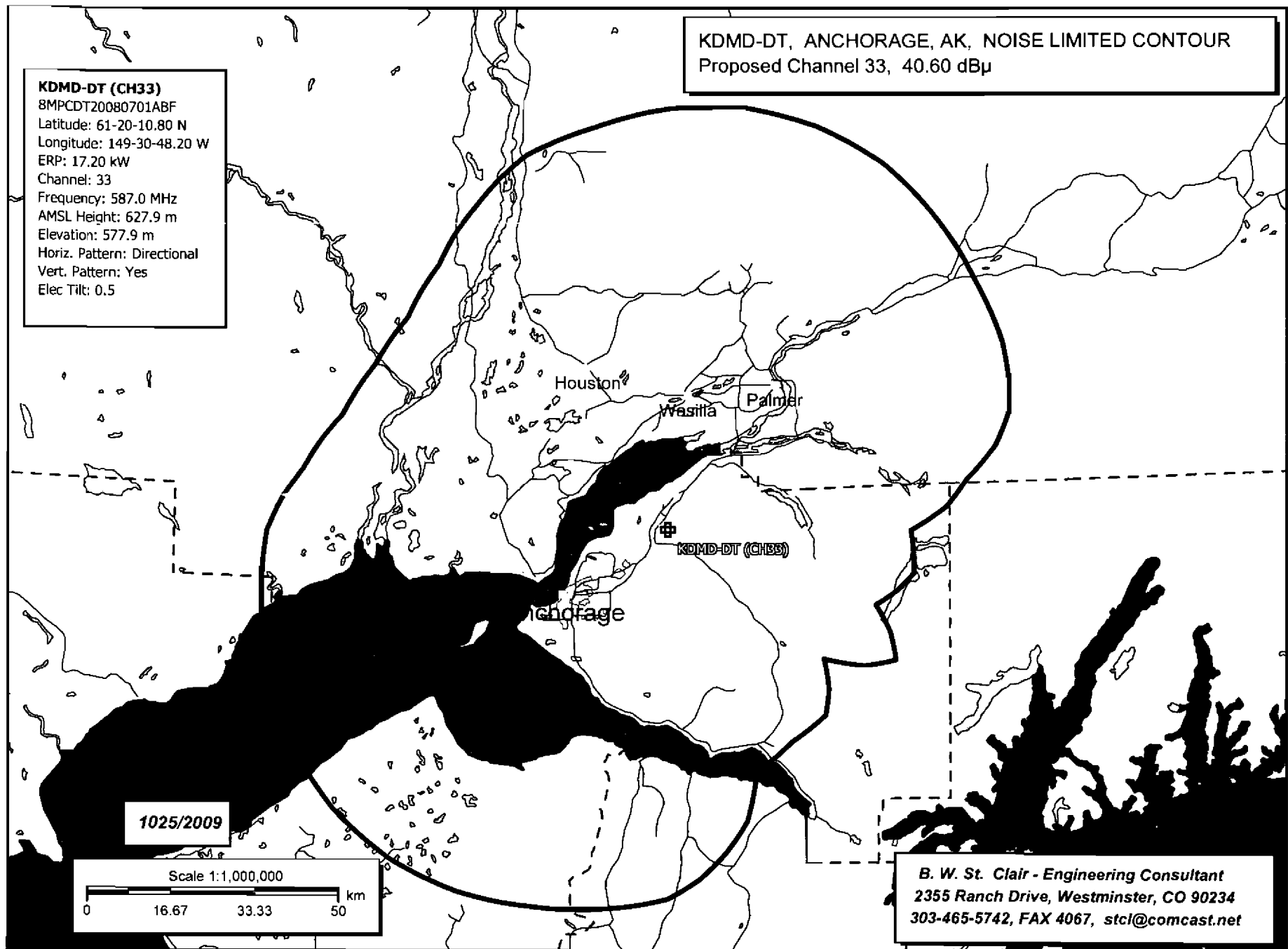
AMSL Height: 627.9 m

Elevation: 577.9 m

Horiz. Pattern: Directional

Vert. Pattern: Yes

Elec Tilt: 0.5



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KDMD-DT (CH33)

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Longitude: 149-30-48.20 W

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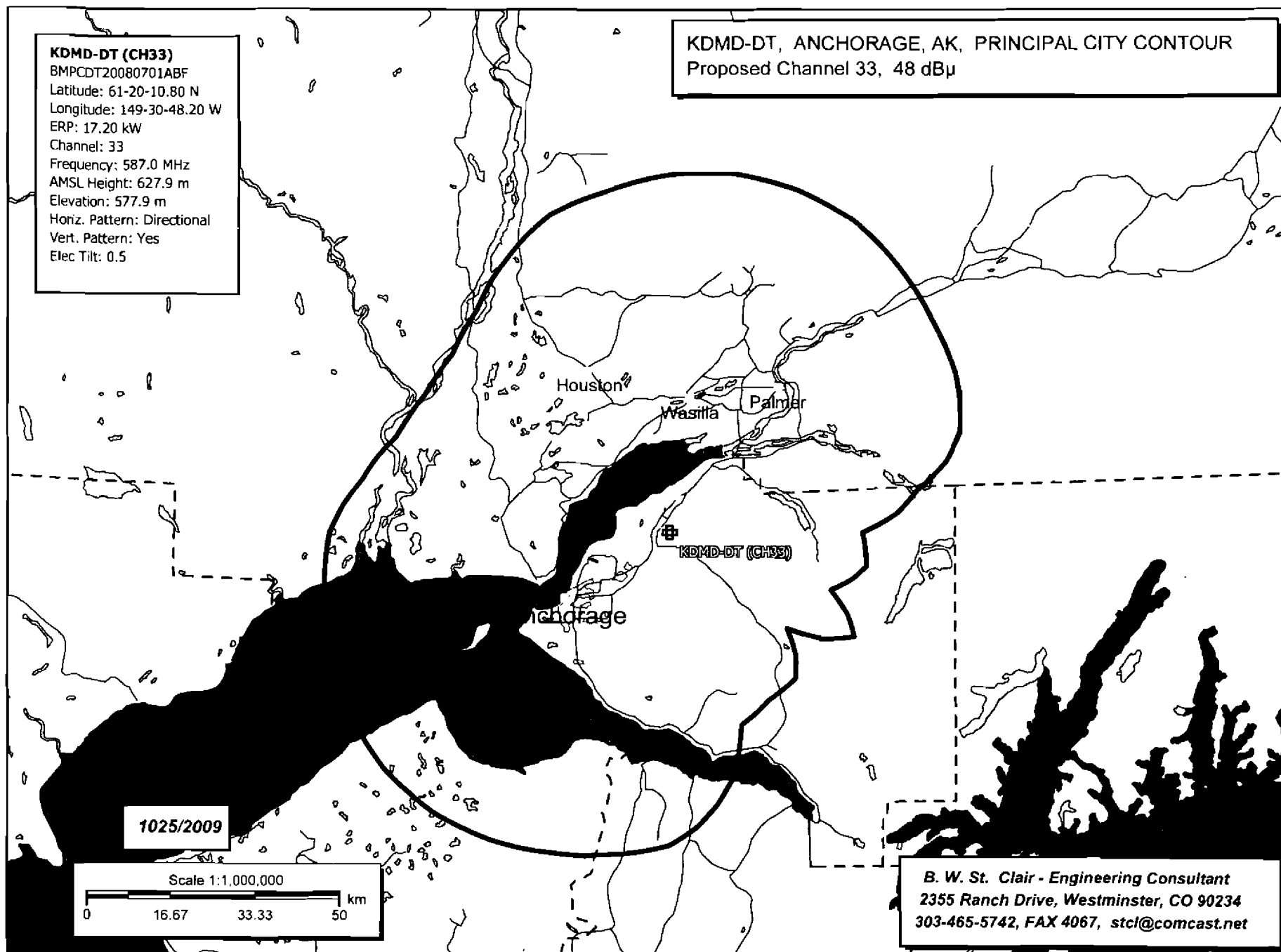
Elevation: 577.9 m

Horiz. Pattern: Directional

Vert. Pattern: Yes

Elec Tilt: 0.5

KDMD-DT, ANCHORAGE, AK, PRINCIPAL CITY CONTOUR
Proposed Channel 33, 48 dBμ



1025/2009

Scale 1:1,000,000

0 16.67 33.33 50 km

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